

August 12, 2002

Mr. Dave Beck  
York Casket Company  
2125 E. County Road 1050 South  
Lynn, IN 47355

Re: **135-15568**  
**First Minor** Permit Modification to  
**Part 70 No.: T 135-7198-00009**

Dear Mr. Beck:

York Casket Company was issued a permit on December 16, 1998 for a casket manufacturing source. A letter requesting changes to this permit was received on April, 17 2002. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of one (1) color coat spray booth, known as P-3C, and one (1) topcoat spray booth, known as P-4C.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire Title V Operating Permit, with all modifications and/or amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 15 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,  
Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
MSS/MES

cc: File - Randolph County  
U.S. EPA, Region V  
Randolph County Health Department  
Air Compliance Section Inspector - Dave Rice  
Compliance Branch - Karen Nowak  
Administrative and Development - Lisa Lawrence  
Technical Support and Modeling - Michelle Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**York Casket Company - Indiana  
US 27 and County Road 1050 South  
Lynn, Indiana 47355**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 135-7198-00009	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 16, 1998  Expiration Date: December 16, 2003

First Administrative Amendment No.: AAT 135-14728-00009, issued August 21, 2001  
First Significant Permit Modification No: SPM 135-15042-00009, issued January 22, 2002  
First Reopening No.: R 135-13463-00009, Issued April 2, 2002  
First Minor Source Modification No.: MSM 136-15524, Issued

First Minor Permit Modification No: MPM 135-15568-00009	Conditions Affected: A.2, D.1.2 - D.1.6 Conditions Added: D.1.2, D.1.3, D.1.6, D.1.7 and D.1.11 plus Quarterly Report Forms Sections Affected: D.1 and D.2
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 12, 2002

York Casket Company - Indiana  
Lynn, Indiana  
Permit Reviewer: MES

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary burial casket manufacturing source.

Responsible Official	Dave Beck
Source Address:	US 27 and County Road 1050 South, Lynn, Indiana 47355
Mailing Address:	2125 E. County Road 1050 South, Lynn, Indiana 47355
SIC Code:	3995
County Location:	Randolph
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major under PSD Rules
	Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

#### Main Plant

- (a) One (1) primer paint spray booth and one (1) bottom primer spray booth, known as P-2A and P-2H, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-2A and EP-2H, capacity: 27 burial caskets per hour, total.
- (b) Two (2) color coat spray booths (#1 and #2) known as P-3A and P-3B, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-3A and EP-3B, capacity 27 burial caskets per hour, total.
- (c) One (1) paint stripper dipping operation, known as P-3C, exhausting through stack EP-3C, capacity: 27 burial caskets per hour.
- (d) Two (2) topcoat spray booths (#1 and #2), known as P-4A and P-4B, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack EP-4A and EP-4B, capacity: 27 burial caskets per hour, total.
- (e) One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.
- (f) One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.

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### Specialty Plant

- (g) One (1) paint spray booth, known as Speciality Plant, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack 1, capacity: 4 burial caskets per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable NSPS or NESHAP requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### **B.2 Definitions [326 IAC 2-7-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3 Permit Term [326 IAC 2-7-5(2)]**

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### **B.4 Enforceability [326 IAC 2-7-7(a)]**

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### **B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### **B.6 Severability [326 IAC 2-7-5(5)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that

IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

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- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V

York Casket Company - Indiana  
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Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on

emissions or potential to emit.

- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the

certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an



applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

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**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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**B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**

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Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAQ, shall reserve the right to issue a new permit.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
---------------

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

#### C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%), any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

#### C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least



260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.9 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling)

Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

##### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

---

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the

“responsible official” as defined by 326 IAC 2-7-1(34).

**C.12 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

---

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

York Casket Company - Indiana  
Lynn, Indiana  
Permit Reviewer: MES

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135-15568-00009  
Amended by: MES

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All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

- (3) An automatic measurement was taken when the process was not operating; or
- (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and



- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## **Stratospheric Ozone Protection**

### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] - Main Plant

- (a) One (1) primer paint spray booth and one (1) bottom primer spray booth, known as P-2A and P-2H, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-2A and EP-2H, capacity: 27 burial caskets per hour, total.
- (b) Two (2) color coat spray booths (#1 and #2) known as P-3A and P-3B, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-3A and EP-3B, capacity 27 burial caskets per hour, total.
- (c) One (1) paint stripper dipping operation, known as P-3C, exhausting through stack EP-3C, capacity: 27 burial caskets per hour.
- (d) Two (2) topcoat spray booths (#1 and #2), known as P-4A and P-4B, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack EP-4A and EP-4B, capacity: 27 burial caskets per hour, total.
- (e) One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.
- (f) One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from spraying operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPS) [326 IAC 8-1-6] [326 IAC 2-4.1-1] [326 IAC 2-2] [40 CFR 52.21]

- (a) The potential to emit VOC from the two (2) spray booths, known as P-3C and P-4C shall be limited to less than twenty-five (25) tons twelve (12) consecutive month period, total; and
- (b) The potential to emit of an individual HAP shall be limited to less than ten (10) tons per twelve (12) consecutive month period and a combination of HAPs shall be limited to less than twenty-five (25) tons per twelve (12) consecutive, total.
- (c) Therefore, the requirements of 326 IAC 2-4.1-1, 326 IAC 8-1-6, 326 IAC 2-2 and 40 CFR 52.21 do not apply.

#### D.1.3 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7-10.5(d)(5)(E)]

- 
- (a) The total solids delivered to the applicators at the two (2) spray paint booths (P-3C and P-4C) shall not exceed 73.1 tons per twelve (12) consecutive month period.
  - (b) Based on a minimum sixty-five percent (65%) transfer efficiency and a forty percent (40%) control efficiency, this total solids throughput limit is equivalent to a potential to emit PM<sub>10</sub> (since PM is equal to PM<sub>10</sub>) before controls from the two (2) spray booths (P-3C and P-4C) of less than fifteen (15) tons per year.
  - (c) Compliance with this throughput limit and a minimum sixty-five percent (65%) transfer efficiency and a forty percent (40%) control efficiency renders the requirements of 326 IAC 2-7-10.5(f), 326 IAC 2-2 and 40 CFR 52.21 not applicable.

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**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

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**D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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**D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)**

Compliance with the VOC and HAP usage limitations contained in Condition D.1.2 and shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

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**D.1.7 VOC and HAPs Emissions**

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage for the twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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**D.1.8 Particulate Matter (PM)**

The dry filters for PM control shall be in operation at all times when spray coating is in operation.

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**D.1.9 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks EP-2A, EP-2H, EP-3A, EP-3B, EP-4A, EP-4B, EP-3C and EP-4C while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit

shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, D.1.3 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, HAPS, and PM<sub>10</sub> emission limits established in Conditions D.1.2 and D.1.3.
  - (1) The amount as well as the VOC, HAP and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The total VOCS, HAPS and PM<sub>10</sub> emitted for each month; and
  - (4) The weight of the VOCS, HAPS and PM<sub>10</sub> emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.11 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Specialty Plant

- (g) One (1) paint spray booth, known as Speciality Plant, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack 1, capacity: 4 burial caskets per hour.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to Operation Permit-68-01-94-0132, issued on March 12, 1990, the Specialty Plant shall use no more than 2.08 tons of VOC, including coatings, dilution solvents, and cleaning solvents per month. This usage limit makes 326 IAC 8-1-6 not applicable.
- (b) Pursuant to CP 135-4643, issued on July 27, 1995, the amount of stripper used in the stripping operation at the Specialty Plant shall be limited to 3,600 gallons per 12 consecutive month period.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### Compliance Determination Requirements

#### D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 or the particulate matter limit specific in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.2.5 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.6 Particulate Matter (PM)

---

The dry filters for PM control shall be in operation at all times when spray coating is in operation.

#### D.2.7 Monitoring

---

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from paint spray booth Stack 1. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.2.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.1.
  - (1) The amount as well as the VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The amount of stripper used in the stripping operation. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the stripper usage limits established in Condition D.2.1(b).
  - (3) A log of the dates of use;
  - (4) The volume weighted VOC content of the coatings used for each month;
  - (5) The cleanup solvent usage for each month;
  - (6) The total VOC usage for each month; and
  - (7) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.2 and D.2.7, the Permittee shall maintain a log



of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the semi-annual being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of Each Deviation

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)  
C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  
C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facilities: Spray Booths P-3C and P-4C  
Parameter: VOC Delivered to the Applicators  
Limit: Less than twenty five (25) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facilities: Spray Booths P-3C and P-4C  
Parameter: Single HAP Delivered to the Applicators  
Limit: Less than ten (10) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Attach a signed certification to complete this report.**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facilities: Spray Booths P-3C and P-4C  
Parameter: Combination of HAPs Delivered to the Applicators  
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Combination HAPs (tons)	Combination HAPs (tons)	Combination HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facilities: Spray Booths P-3C and P-4C  
Parameter: Coating Solids  
Limit: The total solids delivered to the applicators shall not exceed 73.1 tons per twelve (12) consecutive month period, total. This throughput limit is equivalent to PM<sub>10</sub> emissions of less than fifteen (15) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Total Solids Delivered (tons)	Total Solids Delivered (tons)	Total Solids Delivered (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

York Casket Company - Indiana  
Lynn, Indiana  
Permit Reviewer: MES

First Minor Permit Modification  
135-15568-00009  
Amended by: MES

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OP No. T 135-7198-00009

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report Submitted Quarterly**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facility: Specialty Plant paint spray booth  
Parameter: VOC  
Limit: 2.08 tons per month

YEAR: \_\_\_\_\_

Month	VOC (tons)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facility: Stripping Operation  
Parameter: Stripper  
Limit: 3,600 gallons per 12 consecutive month period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

August 12, 2002

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Minor Source Modification and Minor Permit Modification to a Part 70 Operating Permit

Source Name:	York Casket Company - Indiana
Source Location:	US 27 and County Road 1050 South, Lynn, Indiana 47355
County:	Randolph
Operation Permit No.:	T 135-7198-00009
Minor Source Modification No.:	135-15524-00009
Minor Permit Modification No.:	135-15568-00009
SIC Code:	3995
Permit Reviewer:	Michael S. Schaffer

On May 14, 2002, the Office of Air Quality (OAQ) had a notice published in The News-Gazette, Winchester, Indiana, stating that York Casket Company - Indiana had applied for a Minor Permit Modification to a Part 70 Operating Permit to construct a burial casket manufacturing source with control. The notice also stated that OAQ proposed to issue a Minor Permit Modification and provided information on how the public could review the proposed Minor Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Minor Permit Modification to a Part 70 Operating Permit should be issued as proposed.

On June 13, 2002, Ann York and Dan Mills, both of The York Group, Inc. submitted comments on the proposed Minor Permit Modification to a Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

#### Comment 1:

Condition D.1.3, Particulate Matter (PM<sub>10</sub>). This condition sets a limit on the total solids delivered to the coating applicators in booths P-3C and P-4C, such that the requirements of 326 IAC 2-2 and 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 326 IAC 2-7-10.5(f), significant source modifications would not apply. This limit is equivalent to 15 tons/year of PM/PM<sub>10</sub>, assuming 65% transfer efficiency and no control from the dry filters. We have several concerns with this limit. First, it assumes that without controls all of the solids would be emitted at PM<sub>10</sub>. In fact we believe that most of the solids would be emitted as particles larger than PM<sub>10</sub>. Second, the 15-ton/year limit is based on the PSD definition of Major Modification, and under the PSD rules we can assume the use of controls provided they are federally enforceable. Since the permit requires the use of the dry filters, the limited Potential to Emit without a usage limit, and assuming 95% control would be 1.5 tons/year. As such there is no need to limit the solids usage for the purpose of limiting PM<sub>10</sub> emissions to less than 15 tons/year.

In order to render the requirements of 326 IAC 2-7-10.5(f) not applicable, the appropriate limit would be 25 tons/year for PM and PM<sub>10</sub>. Therefore, the appropriate limit would be 71.42 tons per 12-month period of solids delivered to the coating applicator. Lastly we would point out that the limit on VOCs contained in condition D.1.2(a) will effectively restrict the uncontrolled PM and PM<sub>10</sub> emissions to much less than 25 tons/year. As shown in the analysis in our application materials, a 25-ton/year VOC limit would restrict PM/PM<sub>10</sub> emissions to approximately 5.7 tons/year. Based on this discussion, we would request that condition D.1.3 be removed from the permit, since the VOC limit accomplishes the same

objective. If this is deemed not to be appropriate we would request that the limit be amended to 71.42 tons per 12-month period.

**Response 1:**

A PSD synthetic minor limit is required since without controls and limits, the modification is major for PSD. The condition is required to make the controls and limits enforceable. The limit for total solids delivered to the applicators at the two (2) spray paint booths (P-3C and P-4C) was calculated to comply with 326 IAC 2-7.10.5(f)(4) before controls, and 326 IAC 2-2 after controls. Pursuant to 326 IAC 2-7.10.5(f)(4), in order for this modification to be classified as a minor source modification, the potential to emit PM and PM<sub>10</sub> shall each be less than twenty-five (25) tons per year before controls. In addition, pursuant to 326 IAC 2-2, the potential to emit PM<sub>10</sub> after controls shall be less than the PSD significant level of fifteen (15) tons per year to render the requirements of 326 IAC 2-2 not applicable. Therefore, the limit of total solids delivered to the applicators from Condition D.1.3 will be changed to a limit after controls to comply with 326 IAC 2-2 and make this a minor source modification pursuant to 326 IAC 2-7.10.5(f)(4). This limit is necessary because a VOC limit alone does not definitively reduce the total solids delivered to the applicators. Therefore, Condition D.1.3 will not be removed from this permit and has been revised as follows:

**D.1.3 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7-10.5(d)(5)(E)]**

- (a) The total solids delivered to the applicators at the two (2) spray paint booths (P-3C and P-4C) shall not exceed ~~42.8~~ **71.3** tons per twelve (12) consecutive month period.
- (b) Based on a minimum sixty-five percent (65%) transfer efficiency **and a forty percent (40%) control efficiency**, this total solids throughput limit is equivalent to a potential to emit PM<sub>10</sub> (since PM is equal to PM<sub>10</sub>) before controls from the two (2) spray booths (P-3C and P-4C) of less than fifteen (15) tons per year.
- (c) Compliance with this throughput limit, a minimum sixty-five percent (65%) transfer efficiency **and a forty percent (40%) control efficiency** renders the requirements of 326 IAC 2-7-10.5(f), 326 IAC 2-2 and 40 CFR 52.21 not applicable.

In addition, the quarterly report form has been revised as a follows:

Source Name:	York Casket Company - Indiana
Source Address:	US 27 and County Road 1050 South, Lynn, Indiana 47355
Mailing Address:	2125 E. County Road 1050 South, Lynn, Indiana 47355
Part 70 Permit No.:	T 135-7198-00009
Facilities:	Spray Booths P-3C and P-4C
Parameter:	Coating Solids
Limit:	The total solids delivered to the applicators shall not exceed <del>42.8</del> <b>71.3</b> tons per twelve (12) consecutive month period, total. This throughput limit is equivalent to PM <sub>10</sub> emissions of less than fifteen (15) tons per twelve (12) consecutive month period, total

**Comment 2:**

Condition D.1.10, Recordkeeping Requirements. We would request that paragraph (a) be amended to read as follows: *"To document compliance with Condition D.1.1 and D.1.9 the Permittee ..."* The

proposed condition refers to conditions D.1.2 and D.1.3, which restrict the total material usage, and are based on the assumption that there are no controls. The requirements of D.1.10(a) have to do with the operation of the PM control device, and therefore should not reference these two conditions.

**Response 2:**

The recordkeeping requirements of Conditions D.1.10(a) will not be required to document compliance with Condition D.1.2 because the limitations in Condition D.1.2 are not related to the overspray of PM<sub>10</sub>. However, documenting compliance with the requirements of Condition D.1.3 will be required in Condition D.1.10(a) because the total material usage requirement has not been removed from this modification. Therefore, Condition D.1.10(a) has been revised as follows:

**D.1.10 Record Keeping Requirements**

---

- (a) To document compliance with Conditions **D.1.1**, ~~D.1.2~~, D.1.3 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

August 12, 2002

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Minor Source and Minor Permit Modifications

#### Source Background and Description

<b>Source Name:</b>	<b>York Casket Company</b>
<b>Source Location:</b>	<b>Corner of U.S. and Country Road 1050 South, Lynn, Indiana 47355</b>
<b>County:</b>	<b>Randolph County</b>
<b>SIC Code:</b>	<b>3995</b>
<b>Operation Permit No.:</b>	<b>T 135-7198-00009</b>
<b>Operation Permit Issuance Date:</b>	<b>December 16, 1998</b>
<b>Minor Source Modification No.:</b>	<b>135-15524-00009</b>
<b>Minor Permit Modification No.:</b>	<b>135-15568-00009</b>
<b>Permit Reviewer:</b>	<b>Michael S. Schaffer</b>

The Office of Air Quality (OAQ) has reviewed a modification application from York Casket Company relating to the construction and operation of the following emission units and pollution control devices:

- (a) One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.
- (b) One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.

#### History

On April 17, 2002, York Casket Company submitted an application to the OAQ requesting to add additional two (2) spray booths to their existing plant. York Casket Company was issued Part 70 permit T 135-7198-00009 on December 16, 1998, First Administrative Amendment AA 135-14728-00009 on August 21, 2001, First Significant Permit Modification SPM 135-15042-00009 on January 22, 2002 and First Reopening to a Part 70 Operating Permit R 135-13463-00009 on April 2, 2002.

#### Enforcement Issue

There are no enforcement actions pending.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
EP-3C	color coat spray booth	19	2.0	9000	70
EP-4C	topcoat spray booth	27	2.0	9000	70



York Casket Company  
Lynn, Indiana  
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Source Modification: 135-15524-00009  
Permit Modification: 135-15568-00009

## Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 17, 2002.

## Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.

## Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	31.3
PM <sub>10</sub>	31.3
SO <sub>2</sub>	-
VOC	136
CO	-
NO <sub>x</sub>	-

HAPS	Potential To Emit (tons/year)
Xylene	20.5
Toluene	0.240
Ethyl Benzene	4.20
Glycol Ethers	18.7
TOTAL	43.7

York Casket Company  
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Source Modification: 135-15524-00009  
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### Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5)(A) and 326 IAC 2-7-10.5(d)(5) (E). This is a minor source modification because the potential to emit will be limited to less than twenty-five (25) tons per year of any regulated pollutant, except less than fifteen (15) tons per year for PM<sub>10</sub>. Hazardous air pollutants will be limited to less than ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants. The potential to emit VOC will be limited by the total annual solvent usage and/or maximum volatile organic compound content of the materials used in the proposed booths and the potential to emit PM<sub>10</sub> will be limited by the annual raw material (solids) throughput.

The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Minor Permit Modification (MPM 135-15568-00009) in accordance with 326 IAC 2-7-12(b)(1). The Minor Permit Modification will give the source approval to operate the proposed emission units.

### County Attainment Status

The source is located in Randolph County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Randolph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Randolph County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours

of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM <sub>10</sub>	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of two (2) hundred fifty (250) tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Part 70 Operating Permit for this source T 135-7198-00009.

#### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO <sub>x</sub> (tons/yr)
Proposed Modification	0.288	0.288	-	less than 25	-	-
Contemporaneous Increases	0.288	0.288	-	less than 25	-	-
Net Emissions	0.288	0.288	-	less than 25	-	-
PSD Significant Level	25	15	40	40	100	40

York Casket Company has elected to limit the potential to emit VOC from the two (2) new spray booths, known as P-3C and P-4C to a total of less than twenty-five (25) tons per year and the potential to emit PM<sub>10</sub> to less than fifteen (15) tons per year. York Casket Company will also limit the potential to emit a combination of HAPS to less than twenty five (25) tons per year and each individual HAP to less than ten (10) tons per year.

This modification to an existing major stationary source is not major because the limited emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### Federal Rule Applicability

- (a) This modification does not involve a pollutant-specific emissions unit with the potential to emit after limits and controls in an amount equal to or greater than one hundred (100) tons per year. The two (2) additional spray booths, know P-3C and P-4C are also not considered large pollutant specific emission units because the potential to emit after controls and limitations are less than one hundred percent (100%) of the amount required for a source to be classified as a major source. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed modification.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 5-1 (Opacity)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

The addition of the two (2) proposed spray booths to this existing major source is not subject to the requirements of 326 IAC 2-2 since VOC emission limits and PM<sub>10</sub> emission limits do not exceed PSD significant levels.

##### **326 IAC 2.4.1-1 (New Source Toxics Control)**

The two (2) proposed additional spray booths are considered a modification to an existing coating line. The two (2) proposed additional spray booths will not be considered a reconstruction as defined by NESHAP to the existing coating line. Therefore, the requirements of 326 IAC 2.4.1-1 do not apply to the two (2) additional paint booths.

##### **326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the two (2) additional spray booths, known as P-3C and P-4C shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the two (2) spray booths are in operation, in order to comply with this limit.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

The two (2) additional spray booths, known as P-3C and P-4C, are not subject to the requirements of 326 IAC 8-2-9 because pursuant to 326 IAC 8-2-9(b)(10), the application of coatings to burial caskets (Standard Industrial Classification Code 3995) in Randolph County are exempt from the requirements of 326 IAC 8-2-9.

#### 326 IAC 8-1-6 (New facilities; General Reduction Requirements)

The potential to emit VOC from the two (2) additional spray booths, known as P-3C and P-4C shall be limited to less than 22.7 megagrams (25 tons) per year. Therefore, the reduction requirements using best available control technology (BACT) pursuant to 326 IAC 8-1-6 do not apply.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The two (2) additional proposed spray booths, known as P-3C and P-4C has applicable compliance monitoring conditions as specified below: list conditions

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for P-3C and P-4C. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the spray booths is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.



- (b) Monthly inspections shall be performed of the coating emissions from the spray booths stack exhausts, known as Stacks EP-3C and EP-4C, for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters to control overspray must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

### Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

##### Main Plant

- (a) One (1) primer paint spray booth and one (1) bottom primer spray booth, known as P-2A and P-2H, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-2A and EP-2H, capacity: 27 burial caskets per hour, total.
- (b) Two (2) color coat spray booths (#1 and #2) known as P-3A and P-3B, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-3A and EP-3B, capacity 27 burial caskets per hour, total.
- (c) One (1) paint stripper dipping operation, known as P-3~~CD~~, exhausting through stack EP-3C, capacity: 27 burial caskets per hour.
- (d) Two (2) topcoat spray booths (#1 and #2), known as P-4A and P-4B, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack EP-4A and EP-4B, capacity: 27 burial caskets per hour, total.
- (e) **One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.**
- (f) **One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.**

Specialty Plant

- ~~(e)~~(g) One (1) paint spray booth, known as Speciality Plant, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack 1, capacity: 4 burial caskets per hour.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] - Main Plant

- (a) One (1) primer paint spray booth and one (1) bottom primer spray booth, known as P-2A and P-2H, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-2A and EP-2H, capacity: 27 burial caskets per hour, total.
- (b) Two (2) color coat spray booths (#1 and #2) known as P-3A and P-3B, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-3A and EP-3B, capacity 27 burial caskets per hour, total.
- (c) One (1) paint stripper dipping operation, known as P-3C, exhausting through stack EP-3C, capacity: 27 burial caskets per hour.
- (d) Two (2) topcoat spray booths (#1 and #2), known as P-4A and P-4B, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack EP-4A and EP-4B, capacity: 27 burial caskets per hour, total.
- (e) One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.**
- (f) One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.**

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from spraying operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-6] [326 IAC 2-4.1-1] [326 IAC 2-2] [40 CFR 52.21]

- (a) The potential to emit VOC from the two (2) spray booths, known as P-3C and P-4C shall be limited to less than twenty-five (25) tons twelve (12) consecutive month period, total; and
- (b) The potential to emit of an individual HAP shall be limited to less than ten (10) tons per twelve (12) consecutive month period and a combination of HAPs shall be limited

to less than twenty-five (25) tons per twelve (12) consecutive, total.

- (c) Therefore, the requirements of 326 IAC 2-4.1-1, 326 IAC 8-1-6, 326 IAC 2-2 and 40 CFR 52.21 do not apply.

**D.1.3 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7-10.5(d)(5)(E)]**

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- (a) The total solids delivered to the applicators at the two (2) spray paint booths (P-3C and P-4C) shall not exceed 42.8 tons per twelve (12) consecutive month period.
- (b) Based on a minimum sixty-five percent (65%) transfer efficiency, this total solids throughput limit is equivalent to a potential to emit PM<sub>10</sub> (since PM is equal to PM<sub>10</sub>) before controls from the two (2) spray booths (P-3C and P-4C) of less than fifteen (15) tons per year.
- (c) Compliance with this throughput limit and a minimum sixty-five percent (65%) transfer efficiency renders the requirements of 326 IAC 2-7-10.5(f), 326 IAC 2-2 and 40 CFR 52.21 not applicable.

**D.1.2 4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.3 5 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)**

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Compliance with the VOC and HAP usage limitations contained in Condition D.1.2 and shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.1.7 VOC and HAPs Emissions**

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Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage for the twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.4 8 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when spray coating is in operation.

**D.1.5 9 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks EP-2A, EP-2H, EP-3A, EP-3B, EP-4A, and EP-4B, EP-3C and EP-4C while one or more of the booths are in operation. The Compliance

Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **D.1.6 10 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.2, **D.1.3** and D.1.5 **9**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) **To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, HAPs, and PM<sub>10</sub> emission limits established in Conditions D.1.2 and D.1.3.**
  - (1) **The amount as well as the VOC, HAP and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
  - (2) **A log of the dates of use;**
  - (3) **The total VOCs, HAPs and PM<sub>10</sub> emitted for each month; and**
  - (4) **The weight of the VOCs, HAPs and PM<sub>10</sub> emitted for each compliance period.**
- (b)(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.11 Reporting Requirements**

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**A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

**Facility Description [326 IAC 2-7-5(15)] Specialty Plant**

(e) (g) One (1) paint spray booth, known as Speciality Plant, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack 1, capacity: 4 burial caskets per hour.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facilities: Spray Booths P-3C and P-4C.  
Parameter: VOC Delivered to the Applicators  
Limit: Less than twenty five (25) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

York Casket Company  
Lynn, Indiana  
Permit Reviewer: MSS/MES

Page 15 of 19  
Source Modification: 135-15524-00009  
Permit Modification: 135-15568-00009

**Phone:** \_\_\_\_\_

**Attach a signed certification to complete this report.**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

**Source Name:** York Casket Company - Indiana  
**Source Address:** US 27 and County Road 1050 South, Lynn, Indiana 47355  
**Mailing Address:** 2125 E. County Road 1050 South, Lynn, Indiana 47355  
**Part 70 Permit No.:** T 135-7198-00009  
**Facilities:** Spray Booths P-3C and P-4C.  
**Parameter:** Single HAP Delivered to the Applicators  
**Limit:** Less than ten (10) tons per twelve (12) consecutive month period, total

**YEAR:** \_\_\_\_\_

Month	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

**Source Name:** York Casket Company - Indiana  
**Source Address:** US 27 and County Road 1050 South, Lynn, Indiana 47355  
**Mailing Address:** 2125 E. County Road 1050 South, Lynn, Indiana 47355  
**Part 70 Permit No.:** T 135-7198-00009  
**Facilities:** Spray Booths P-3C and P-4C.  
**Parameter:** Combination of HAPS Delivered to the Applicators  
**Limit:** Less than twenty-five (25) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Combination HAPs (tons)	Combination HAPs (tons)	Combination HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

**Source Name:** York Casket Company - Indiana  
**Source Address:** US 27 and County Road 1050 South, Lynn, Indiana 47355  
**Mailing Address:** 2125 E. County Road 1050 South, Lynn, Indiana 47355  
**Part 70 Permit No.:** T 135-7198-00009  
**Facilities:** Spray Booths P-3C and P-4C  
**Parameter:** Coating Solids  
**Limit:** The total solids delivered to the applicators shall not exceed 42.8 tons per twelve (12) consecutive month period, total. This throughput limit is equivalent to PM<sub>10</sub> emissions of less than fifteen (15) tons per twelve (12) consecutive month period, total

**YEAR:** \_\_\_\_\_

Month	Total Solids Delivered (tons)	Total Solids Delivered (tons)	Total Solids Delivered (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Attach a signed certification to complete this report.**

**Conclusion**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 135-15524-00009 and Minor Permit Modification No. 135-15568-00009.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

Page 1 of 2 TSD App A

**Company Name: York Casket Company  
Address City IN Zip: U.S. 27 and County Road 1050 South, Lynn, Indiana 47355  
MSM: 135-15524  
Plt ID: 135-00009  
Reviewer: Michael S. Schaffer  
Date: April 17, 2002**

Material	Density (lbs/gal)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (lbs/unit)	Particulate Potential (lbs/hr)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Low HAPs Topcoat	8.08	0.21000	14.000	4.58	13.47	323.16	58.98	0.26	3.64	15.94	N/A	65%
Composite Color coat	7.96	0.24600	14.000	5.10	17.56	421.55	76.93	0.25	3.50	15.33	N/A	65%

	PM	Control Efficiency	95.00%									
<b>State Potential Emissions</b>				<b>Uncontrolled</b>	<b>31.03</b>	<b>744.71</b>	<b>135.91</b>			<b>31.27</b>		
<b>Add worst case coating to all solvents</b>				<b>Controlled</b>	<b>31.03</b>	<b>744.71</b>	<b>135.91</b>			<b>1.56</b>		
METHODOLOGY												

**Note\* Source will be taking a limit on VOC to less than 25 tons per year and total solid throughput shall be no more than 42.8 tons per year to ensure PM-10 Emissions are less than 15 tons per year.**

Pounds of VOC per Gallon Coating was given to us by the applicant

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations  
HAP Emission Calculations**

Page 2 of 2 TSD AppA

**Company Name: York Casket Company  
Address City IN Zip: U.S. 27 and County Road 1050 South, Lynn, Indiana 47355  
MSM: 135-15524  
Plt ID: 135-00009  
Reviewer: Michael S. Schaffer  
Date: April 17, 2002**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Glycol Ethers	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)
Low HAPs Topcoat	8.08	0.21000	14.000	0.00%	0.00%	0.00%	18.00%	0.00	0.00	0.00	18.73
Composite Color Coat	7.96	0.24600	14.000	17.10%	0.20%	3.50%	0.00%	20.53	0.240	4.20	0.00
<b>Individual Total</b>								<b>20.5</b>	<b>0.240</b>	<b>4.20</b>	<b>18.73</b>
<b>METHODOLOGY Overall Total</b>								<b>43.7</b>			

**NOTE\*** This source shall limit total HAPs to 8.04 tons per year in conjunction with the twenty-five (25) ton per year VOC limit.

HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs